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ABSTRACT

A survey of 130 high school principals in 3 southern states revealed alcohol abuse, insubordination, and other misbehavior as the major causes for excluding students from participation in school activities. The study also indicated that students have to meet disproportionately higher standards to participate in athletics, cheerleading, and student government than to participate in such other activities as student journalism, dramatics, music, clubs, and intramural sports. Eligibility standards for different activities are affected in different ways by school size, community type, and whether the school was public or private. The researchers conclude that eligibility requirements are too often unrelated to the associated activities and are merely tools for punishing students for misconduct in academic areas where traditional disciplinary practices are failing. Furthermore, eligibility requirements are described as often arbitrary and capricious, leaving schools open to challenge in the courts. (PGD)

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Factors Related to Exclusion of Students from School Activities

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Factors Related to Exclusion of Students From School Activities

The purpose of this study was to determine practices that relate to student eligibility and participation in extracurricular and athletic activities in high school. Specific questions were designed to provide information about the following:

1. What are the exclusion practices for students who participate in extracurricular activities and do practices differ for athletics when compared to other activities?

2. Do practices differ with respect to the following demographic characteristics: (a) school size, (b) community-type, and (c) private versus public supported schools?

3. Who has primary authority to exclude students who wish to participate in selected activities? That is, are eligibility regulations applied evenly by all faculty/coaches?

4. Do schools tend to establish eligibility standards at a higher level than those required of high school associations?

5. Is there evidence that the legal rights of students are being violated?

The research literature on extracurricular activities revealed that studies have been conducted to demonstrate the value and influence of these activities on students. However, not much has been done that related directly to the focus of the research reported in this study, exclusion of students from participation.

While it has been suggested that the most important objective of the student activities program should be the development of a more positive attitude of students toward themselves, toward avocational and recreational activities and toward the school itself (Gorton, 1976), NAASP sponsored research (Long, 1977) indicated that only the needs of academically average males, highly academic females, extremely creative students and minority group students were being met. Particularly not served were low ability

students and nonconformists. Although one-fifth of the students indicated a desire for such participation, a sizeable proportion were not involved in school governance (66%) or service activities (80%). Except for vocational and hobby clubs, vocational-technical students (VT) did not participate in high school extracurricular activities nearly as much as students in academic programs (A) (Peng, 1975). This was true for athletics (VT = 32% vs A = 53%); cheerleading and similar activities (15% vs 20%); debating, drama, band, or chorus (22% vs 39%); scholastic honorary clubs (7% vs 25%); school newspaper, yearbook (15% vs 25%); school subject matter clubs (23% vs 30%); and student council, government or political clubs (12% vs 27%).

In a study which explored the relationship between self-concept and student participation in extracurricular activities, it was found that the total self concept of high frequency participants was significantly greater than that of low frequency participants (Yarworth & Gauthier, 1978). And in a study about personality and academic achievement differences between athletic and nonathletic 9th and 10th grade girls, Taylor (1973) found that the greater the degree of athletic competence, the more aggressive, persistent, and potentially leader-like the individual. In the personality trait of sociability, female athletes were found to be more outgoing, enterprising, ingenious, competitive and forward.

Extracurricular activities are designed to provide students with experiences that are not customarily a part of the regular academic program. Since schools tend to espouse an interest in the development of facets of behavior other than those that relate to cognitive outcomes, i.e. social, physical and personal outcomes, it seems ironical that many adopt restrictive policies and practices which deny students the right to participate in them. We argue that such punitive policies are frequently unrelated to sound educational rationale and may be perceived to be undemocratic.

Methodology

A survey instrument was distributed to principals from three states. Respondents were asked to indicate reasons for excluding students from the following activities, Sports, Student Government (SGA), Cheerleading, Newspaper Staff, Dramatics, Band/Chorus, Intramurals, Clubs and Class Office. Reasons for exclusion were related to personal behavior of students and included grade requirements and misbehavior.

The study was based upon a random sample (stratified by state and school size) of public secondary schools and private schools listed in CIC's School Directory (1978). Schools from North Carolina, South Carolina and Virginia were included.

One hundred and eighty schools were selected. For each state all school districts composed of schools having enrollments greater than 1500, less than 500, and between 500 and 1500 were identified and, 15 schools from each category were chosen. In addition, 15 private schools were chosen from each state. Thus each state was represented by a total of 60 schools.

After initial contact and follow up, returns were obtained from 130 schools, 72% of the sample. States were approximately equally represented with returns ranging from 41 North Carolina schools to 46 from Virginia. The distribution of private (24%) versus public (76%) school returns is consistent with that of the original sample. No bias in return rate was determined to exist when school enrollment was considered.

Data treatment techniques were predominately descriptive statistics, including analyses of rankings, proportions, and measures of variation. Where appropriate, nonparametric tests were conducted to determine if there were significant relationships among variables.

Eligibility Practices

Table 1 presents major findings of the study. In it is listed the percent of schools which exclude students from participation for reasons cited. We found that alcohol abuse, insubordination and other misbehavior problems were major causes for excluding students from participation in activities. For all activities, except interscholastic sports, alcohol or drug abuse was named as the primary reason for excluding students. The prime reason for not permitting student participation in sports was failure to pass a specified number of courses; alcohol and drug abuse ranked second. Students were not typically excluded for being married or pregnant. While Table 1 gives an overall picture of the relative importance of reasons for exclusions it obscures much of the information we collected. The following paragraphs serve to clarify our findings.

Students were deined participation in athletics in a disproportionate manner when compared to students in other activities. With respect to participation in athletics, 61% of the schools would exclude students for insubordination, which is more than 20 percentage points higher than the mean percentage for excluding students from participating in all activities for the same violation; eighty-two percent would exclude them for not passing a specified number of courses which is 55% higher than that for other activities; and 70% would exclude them for violating training or organizational rules which is 31% higher. Moreover, a higher than average proportion of schools exclude students from sports for being convicted of a crime, for being a disciplinary problem, for abusing alcohol or drugs and for unexcused absences than for other activities.

With respect to involvement in cheerleading, it appears that students are denied participation in a disproportionate manner for about the same reasons that are used for athletics, that is, not passing courses, abusing

Table 1
Proportion of Schools Which Exclude Students
from Participating in Selected
Extracurricular Activities
for Reasons Cited

Activities \ Reasons for Exclusion	Has low grades (specify average required)	Doesn't pass a specified number of courses (specify number required)	Is married	Is pregnant	Is convicted of a crime	Is a disciplinary problem in school	Abuses drugs or alcohol	Violates other training or organizational rules	Insubordinate to a coach or sponsor	Has excessive unexcused absences	Is caught cheating in class	Mean	Standard Deviation
Interscholastic Sports	25	82	8	22	27	49	72	70	61	45	22	44	25
Student Government Assoc.	40	27	5	6	28	49	52	34	40	39	35	32	15
Cheerleading	41	58	7	31	28	53	66	61	57	52	26	44	18
Newspaper/Yearbook Staff	20	18	5	5	20	41	50	35	41	33	21	27	15
Dramatics/Forensics	12	15	3	5	16	28	35	31	32	22	15	22	14
Band/Chorus	10	10	4	6	17	32	42	38	35	28	15	19	11
Intramurals	4	3	2	7	8	16	26	15	19	10	8	11	7
Clubs	13	8	5	5	17	24	37	31	35	23	13	19	12
Class Officer	28	22	5	6	22	42	46	36	36	29	25	27	13
Mean	21	27	5	10	20	37	47	39	40	31	20		
Standard Deviation	13	26	2	9	7	13	15	17	13	13	8		

drugs, violating rules, insubordination, conviction of a crime, being a disciplinary problem, and having unexcused absences. In addition, having low grades prohibits student involvement in cheerleading.

Contrasting participation in the Student Government Association versus other activities, students are penalized for having low grades, being disciplinary problems, being convicted of a crime, and cheating.

When considering mean and standard deviation values for the entire data set no other activity appeared to have unreasonable restrictions placed on them, except those cited above.

Demographic Differences

In view of these findings, analyses were made of those activities having the greatest number of restrictions placed upon them i.e., Sports, Cheerleading and SGA. The question was posed as to whether eligibility requirements for those activities differed with respect to the demographic characteristics of school size, community type and private versus public auspicies. Two criteria for determining whether meaningful differences existed were 1) a 10% disparity among the demographic characteristics and 2) statistical significance, using chi square. For example, if 40% of the small schools indicated they would exclude students from participating in an activity for low grades and 30% or fewer of the middle sized schools indicated the same, the criterion of a 10% disparity would be fulfilled. In order to test for independence between demographic characteristics and eligibility restrictions, contingency tables were generated and a chi square statistic ($p \leq .05$) was used to test whether the demographic characteristics was related to a restriction, e.g. low grades.

Using the 10% criterion for the variable school size, differences were found which suggest that both large and small schools place more restrictions than medium sized schools in allowing students to take part in interscholastic

sports and cheerleading. Typical reasons for exclusion included low grades, not passing courses and behavioral problems such as rule violation, discipline problems, drug abuse and insubordination. All schools, regardless of size, tended to exhibit more evenness in their attitude toward the SGA activity and no consistent differences were noted. One interesting observation was that large schools appeared to be especially strict with regard to passing courses, drug abuse, rule violation and insubordination. For all three activities, sports, cheerleading, and SGA small schools had a uniquely tough policy with regard to students being convicted of a crime. In summary, a total of 33 differences among schools were noted using the 10% difference criterion. In 14 cases small schools were more restrictive; in 15 large schools; in 4 middle sized schools.

Using the χ^2 test of independence five differences were noted. For sports, significant relationships existed between school size and three of the reasons for exclusion, low grades, rule violation, and insubordination. The small schools had a higher (38%) incidence of restricting students from engaging in sports for low grades than both middle (19%) and large (16%) schools. A greater proportion of large (81%) and small (77%) schools prohibited students from sports for rule violations than the middle sized schools (57%). Insubordinate students were excluded from sports in large (71%) and small (68%) schools moreso than in the middle (46%) sized schools. The large and small schools tended to be more restrictive in sports than middle sized schools. Two reasons for restricting cheerleaders, doesn't pass a specific number of courses and being a disciplinary problem in school, were significantly related to school enrollment. In both cases the large and small schools were more restrictive than the middle sized schools. There were no indications of dependence with respect to school size and restrictions placed upon students in SGA.

Using the 10% criterion for the community type variable, it was determined that urban and small towns had more constraints on student involvement in extracurricular activities than other types of communities. In the current analysis it was found that more restrictions were placed on all three types of activities, sports, cheerleading and SGA. One hundred and eleven differences that were greater than 10% were observed. For 51 of these, small towns were more restrictive and for 46, urban areas were more restrictive. In only fourteen cases were suburban or rural areas found to be more restrictive.

Testing for independence, we found that community type was related to two of the elevent reasons for excluding students from sports, pregnancy and excessive absences. Twenty-nine percent of the urban and 33% of the small town principals indicated pregnancy as a restriction versus 0% of the suburban and 20% of the rural principals. Small towns (63%) and urban communities (53%) had the highest proportions of principals indicating excessive absences as a reason for exclusion. Schools from rural communities tended to use excessive absences as a reason for exclusion from sports to a greater extent than suburban communities, 43% versus 24%, respectively. Excluding a student from cheerleading for being convicted, being insubordinate, and/or having excessive unexcused absences was a function of community type. Consistently, urban communities and small towns were restrictive to a greater extent than rural and suburban communities. Community type and restricting students from SGA for abusing drugs and/or alcohol and cheating in school were also dependent. Again, the urban communities and small towns were more strict than the rural and suburban communities.

For the variable, public versus private auspices, we found that private schools are more restrictive than public schools. Of the 13 differences noted, private schools had 10% or greater higher proportions in 12 instances. Reasons noted were similar to those presented earlier.

In observing the relationships between private versus public auspices and reasons for preventing students from participating, there were only two significant ($p \leq .05$) relationships, having low grades and not passing a specific number of courses. In both cases, private institutions were more restrictive than public schools.

Table 2 summarizes findings relating exclusion practices and demographic variables.

Distribution of Authority

Inquiry was made into the matter of whether authority to exclude students from participation was distributed evenly among the faculty assigned to work with students in extracurricular, athletic and/or academic activities. In preliminary discussions we speculated that faculty control (power) over students might not be the same for all the activities. That is, we believed that certain members of the staff might have more voice over students who were placed in their charge. Since we could not determine a reasonable underlying rationale for such differences existing, we thought it would be interesting to investigate the matter in order to confirm our suspicions.

Questions were asked inquiring who would make decisions for excluding students from participating in activities for various types of behavior. The questions were posed such that we were able to determine not only who had the authority for exclusion but whether that authority was pervasive. Three kinds of activity were investigated, (1) sports, (2) extracurricular activities (band, Clubs, Cheerleading and SGA) and (3) academics (required and elective courses). Inquiry was made as to who had authority over students in situations that were related to the activity or unrelated to it. An example of a related activity would be authority to deny a student from playing football if he did not have the ability; an example of an unrelated activity was authority to exclude a student from football for misconduct in class.

Table 2

Frequency of Greater Restrictive Policies
Within Each Demographic Category

		SPORTS	CHEERLEADING	SGA	TOTAL
SCHOOL SIZE	SMALL	6	5	3	14
	MEDIUM	1	0	3	4
	LARGE	4	7	4	15
COMMUNITY TYPE	RURAL	4	2	0	6
	SMALL TOWN	19	17	15	51
	SUBURBAN	0	5	3	8
	URBAN	11	19	16	46
AUSPICES	PUBLIC	1	0	0	1
	PRIVATE	4	2	6	12
TOTAL		50	57	50	

Our results suggest that coaches have more power over students in their charge than other faculty members. Decisions to exclude students from participation in interscholastic sports would be made by the coach 94% of the time if the student lacked the skill to play the sport and 58% of the time if the student were guilty of misconduct while practicing the sport (both related activities). These findings may be compared to a similar situation for academics where classroom teachers essentially were not permitted to made decisions about students in their classes. Only 1% of the teachers had the power to exclude students from their classes for lack of ability on the part of the student and 5% of the teachers could exclude them for misconduct. The individual who had primary control over students in academic situations was the principal. In the case of misconduct in a class the principal had the authority to exclude students 53% of the time (he apparently consults with the teacher in another 18% of the cases). What was even more revealing from the results was that typically students who lacked the ability to pass courses were not objectives of decision making. Rather than being excluded, they were left in their classes and we assume failed.* Table 3 graphically depicts the disparity of power between coaches and teachers.

Sponsors of extracurricular activities also have a great deal more authority than classroom teachers - but not as much as coaches. For them the practice seems to be more one of shared authority (between sponsor and principal) than for either of the other two classifications of faculty. Our data showed that the authority to exclude students from participation in extracurricular activities was the sponsors' in 49% of the

*Even if attendance for certain courses was compulsory it would appear that provisions to protect student welfare, such as changing teachers, remediation etc. could be implemented.

Table 3
Distribution of Authority in Activities
Related to Sports and Academics

Reasons for Exclusion	Sports		Academics	
Misconduct	Coach	58%	Teacher	5%
	Principal	4%	Principal	53%
	Principal and Coach	15%	Principal and Teacher	18%
	Other Parties	22%	Other Parties	13%
	Not Excluded	1%	Not Excluded	11%
Lack of Skill	Coach	94%	Teacher	1%
	Principal	1%	Principal	26%
	Principal and Coach	2%	Principal and Teacher	8%
	Other Parties	1%	Other Parties	40%
	Not Excluded	2%	Not Excluded	25%

cases and shared between principal and sponsor 30% of the time.

Eligibility Standards

The National Federation of State High School Associations, as well as each state association, establishes standards for interscholastic competition. Restrictions covered by the associations and those of this study are related to scholarship of students. The National Federation requires students in interscholastic sports to be passing at least 3 courses (15 semester periods). North and South Carolina have the same requirement; however, North Carolina specifies that at least one course must be English, Math, Social Studies, natural science or foreign language. Virginia requires students to pass 4 rather than 3 courses. We found that 73% of the North Carolina, 91% of the South Carolina, and 83% of the Virginia schools excluded students from interscholastic sports for not passing a specified number of courses. These data suggest that scholastic restrictions on sports in the schools sampled are generally consistent with respective state association guidelines.

The National Federation and individual states differ more on guidelines for non-athletic activities than on sports. Standards for non-athletic activities suggested by the National Federation are limited to activities involving two or more schools. Passing at least 15 semester hours per week is the scholarship standard suggested by the National Federation. The only non-athletic activity covered by North Carolina is cheerleading. North Carolina cheerleaders must exhibit good conduct and sportsmanship at games. Both South Carolina and Virginia have high school leagues which suggest standards for non-athletic activities. School standards for non-athletic activities are the same as for athletics in South Carolina and in Virginia. In Virginia non-athletic activities include cheerleading, forensic and dramatic activities; in South Carolina non-athletic activities include

forensic and dramatic activities, but not cheerleading. From our survey we found that 58% of the schools excluded students from being cheerleaders if they did not pass a specified number of courses. Being excluded from cheerleading for not passing a specified number of courses was not related to the state in which the schools were located. Since a high proportion (69%) of the principals in our sample of returns did not specify the actual number of courses a student must pass to be a cheerleader, state comparisions could not be made.

It appears that schools place many more restrictions on students than are required by state associations. Whether this practice is influenced by state association policy is not clear, but there seems to be no direct relationship between state association regulations and school practice for the majority of activities investigated in this study.

Legal Rights

For sometime the courts have established that participation in interscholastic sports is not a property right. That is, it is not a constitutionally protected right (Moreland v. Western Pa. Interscholastic Athletic Assoc. et al., and Dallam v. Cumberland Valley School District et al). However court cases related to sex discrimination placed educational value upon athletics (Brenden v. Independent School District). Additional cases supported the view that interscholastic competition is a valuable aspect of a student's education (Hoover v. Meiklejohn and Florda High School Activities Association, Inc. v. Bryant). In 1977 the courts ruled that even though there is no constitutional right to participate in interscholastic sports there is a student right to have the opportunity to compete for team membership (Hoover v. Meiklejohn). Isolated cases of prohibiting students who abuse alcohol have been upheld by the courts (Braesch v. DePasquale and French v. Cornwell). Currently, since athletic

associations are viewed as voluntary organizations, the courts tend to avoid interferring with association guidelines except when constitutional rights are violated as in the cases of discrimination with regard to sex and handicapped students.

Recent decisions may bring change in past practice. In Beeson v. Kiowa Cty. School District the appellate court overturned a lower court decision on a student's right to participate in extracurricular activities and declared a school board's policy invalid. Delon (1979) goes on to comment that:

> During the past few years the courts and legislative bodies have recognized and have begun to protect students' rights in the area of extracurricular activities. Participation, which was formally viewed as a privilege, is now considered a right. As in this case, courts are likely to hold marriage an unacceptable justification for denial of such rights.

Discussion

In a study which has so many disparate facets as the one described in this paper it is difficult to sort out those items which have meaningful implications for educational practice. In this section of the paper an attempt will be made to reach closure on what the authors believe to be (1) the major findings of the study and (2) the message or morals of policies that relate to participation in extracurricular activities.

Our major findings indicate that a substantial percentage of schools prohibit students from participating in sports and/or extracurricular activities if they exhibit certain behaviors. The percent varies ($\bar{X}$ = 27%; Range, 11-44%) for the nine activities listed and it appears high when one considers that the principals who responded to our study indicated that such activities are supposed to benefit students by (1) providing them with the opportunities to foster their unique talents and abilities, (2) giving them an opportunity to acquire leadership and decision making skills, (3) helping

create a favorable attitude toward school, (4) enhancing their social skills and, (5) increasing a school's retention power. It seems incongruous that, when one considers the advantages of such programs, schools are prone to prevent those advantages from happening, especially when the vast majority of the reasons for refusing students permission to engage in the activities are unrelated to the activities themselves. We can readily understand why someone might not be permitted to play interscholastic sports if she's 8 months pregnant but we are unable to comprehend why someone should not be permitted to play in the band (or football for that matter) if he/she cheats in class. Why can't someone be a cheerleader if he/she has low grades or play intramurals if he/she is a disciplinary problem in class? None of the above mentioned reasons for exclusion are valid for denying youngsters the right to engage in legitimately sponsored school activities. In fact, it makes about as much sense to use such reasons for excluding students from participating in activities listed in this study as it would for using them to exclude students from participating in academic classes, which rarely, if ever, occurs. One of the basic disciplinary tenets that every educator learns in undergraduate methods courses is that the "punishment should fit the crime." We submit that in most instances the punishment of excluding students from participation in extracurricular activities not only fails to meet that criterion but that it is detrimental to sound educational practice and works against the advantages that are supposed to accrue to students from sports and extracurricular programs. In effect schools are admitting the failure of their own disciplinary systems.

Another interesting finding of the study was the tendency for schools to have more restrictive policies for participation in what the authors believe to be more "prestigious" activities, i.e. interscholastic sports, cheerleading and SGA. Regardless of whether the benefits which students reap from engaging in these three activities are greater than those they derive from participating in others, it is difficult to understand why such a practice exists when the activities are viewed by the students themselves as being most important (Colemen, 1960). The restrictive policy seems to confirm our suspicions that schools use participation in extracurricular activities and sports as "axes held over the heads of students" to assure compliance with a school's behavior standards.

Perhaps the most disconcerting element of all, however, is the tendency of denying students membership on the Student Government Association because of low grades. Forty percent of the schools who responded indicated such a practice; two thirds of those specifying said that a C grade would be required and 28% indicated B or better. It seems contrary to democratic principles to disinfranchise students from participating in the governnance of their school because they cannot or do not meet certain academic requirements. It is comparable to requiring literary tests of voters — or elected officials.

It is easy to speculate why private schools have more restrictive policies than public ones. Many such institutions were established to foster behaviors they believed public schools neglect. While the concern we expressed about democratic principles, above, is appropriate for private as well as public schools, it is understandable (not justifiable) that they might be more inclined to use exclusion to achieve their goals.

Except for the fact that most private schools were small, it is hard to explain the finding that both small and large schools have more restrictive policies, with respect to athletes, cheerleading and SGA, than middle sized schools. Such evidence was corroborated with the findings about schools in urban centers and schools in small towns, which were more restrictive than rural and suburban communities. Any attempt at trying to rationalize that occurance would be pure speculation.

For some time the authors have suspected that the distribution of authority to make decisions about students was not distributed evenly among the faculty of public schools (Weber, 1971). So it was not surprising to discover that coaches appear to have inordinate power over students enrolled in activities they control. Whether, in fact, such a situation should exist is another matter. It appears reasonable that disparity of power among faculty is unjustified. How a system can rationalize providing one specialist with authority and deny it to another is hard to comprehend. If the argument can be made that one group of individuals has the right to make judgments about who shall be educated, then it would seem inconsistent to deny that right to others simply because they constitute a different group. From a point of view of logic we opt for uniform practice.

However, we are not certain which end of the continuum to recommend. That is, should power rest primarily with faculty (coaches and teachers) or with the principal? There are a whole host of reasons for advocating a stance of increasing decision making power for faculty. Among them being the belief that giving administrative authority to faculty develops their professional leadership performance and responsibility (Haynes and Garner, 1977). Moreover, from a point of view of expertise it would appear that faculty should be given more authority. They are in the best position to have first-hand knowledge about the capabilities of students in their

classes. They know if students can function; they see the stress that students experience; they have evidence of students' performance. Certainly no decision about the educational future of a youngster can be made without substantive input from the faculty member who has regular contact with him/her.

On the other hand, a case can be made for not granting any faculty (coach, teacher or sponsor) the liberty of making decisions related to enrollment in his/her classes. One can readily recognize that such power makes possible situations that can be harmful to students. Faculty, being personally involved, may take advantage of their situation and exercise undue retribution. Such a situation would make us argue for having authority placed in the hands of the principal - or some other more objective body. This position is in agreement with the concept of "administrative elitism" which favors creating distance between the immediately concerned groups because of lessened pressure over particular interests and concerns (Spring, 1980).

Maybe the best solution is a compromise between the two points of view. Regardless, it is the opinion that coaches exhibit too much summative power over students. Similarly, it would appear that teachers are not involved in the decision making process nearly enough in matters that pertain to the academic facets of student behavior. Under any circumstances it seems to be a gross miscarriage of justice to ignore the problem, to evade the responsibility of decision making and allow students to fail in the classroom. We are appalled that in one-fourth of the schools students who lack the skill to pass academic courses are apparently victims of apathetic professionals who will not do anything about their plight.

Conclusion

If the tenets of democratic education were to be expressed in a single statement, it might be that "all students have the right to be educated in those areas in which they are competent and from which they derive benefit." Inherent in this statement is the belief that the American educational system should do all it can to implement the principle. Certainly nothing should be done which will hinder the development of any student.

Unfortunately, there are many instances in our educational system where the rights of students are abrogated. The findings of this study indicate that eligibility requirements of schools for allowing students participation in interscholastic athletics and extracurricular activities are arbitrary and capicious and that the public schools are leaving themselves open to challenges in the courts.

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